

organic layer in the invention of admitted prior art before forming cathode for benefit of good adhesion.” Applicants disagree and submit that the combination in support of the rejection is improper.

Kim teaches using plasma to treat the surface of an organic layer, *not* an EL layer as recited in the claimed invention of the present application. The organic layer 155 in Kim is being treated with the plasma to form an interlayer insulator 156 which is being used to enhance the adhesion between the organic layer 155 and an electrode (the ITO layer 140). See e.g. para. 0021 and 0027 in Kim.

In contrast, the “admitted prior art (“related art” in the present application) teaches doping Cs or a similar low work function element in a superficial region of an EL layer by coevaporation so that the doped region can be used as an electron transportation layer.

Hence, the purposes and layers on which the treatments are performed in Kim and the “related art” are quite different. Therefore, there is no motivation or suggestion to combine Kim and the “related art” to arrive at the claimed invention. Accordingly, the combination of these references to arrive at the claimed invention is hindsight reconstruction based on the claimed invention. Such a combination is improper, and as a result, the rejection based thereon is improper. Therefore, it is respectfully requested that this rejection be withdrawn.

IDS

Applicants are preparing and will submit an IDS in the next few days. It is requested that this IDS be considered before any further action is taken on this application.

Conclusion

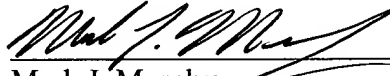
It is respectfully submitted that the present application is now in a condition for allowance and should be allowed.

If any further fee is due for this response, please charge our deposit account 50/1039.

Favorable reconsideration is earnestly solicited.

Respectfully submitted,

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